

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JACOB A. BRUN,

Defendant.

8:20CR38

UNOPPOSED MOTION
TO EXTEND DEADLINE TO FILE
RESPONSIVE BRIEFS

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and requests an extension of time to file a responsive brief to the following:

1. Defendant's Motion to Dismiss Counts (Filings 37 and 39);
2. Defendant's Motion to Suppress (Filing 41); and
3. Defendant's Motion to Sever Counts (Filings 44 and 45).

In support of this request, the undersigned provides the following facts:

1. The undersigned AUSA already faces filing deadlines in a five-defendant homicide case with a deadline of September 8, 2020.
2. The undersigned AUSA is drafting a response on a Motion to Sever for this Court in another case, United States v. Leichleiter, et al.
3. There are complex legal issues, including constitutional issues, that need to be fully briefed and analyzed for this Court in the Defendant's filings.

Consultations with Opposing Counsel and New Deadline Request

I have consulted with opposing appointed counsel, and there is no objection to this request.

For the forgoing reasons, the undersigned AUSA respectfully requests an extension of deadlines to file responses to September 18, 2020.

DATED this 2nd day of September, 2020.

Respectfully submitted,

UNITED STATES OF AMERICA,

JOSEPH P. KELLY
United States Attorney
District of Nebraska

By: s/ Lesley Woods
LESLEY WOODS, TX #24092092
Assistant U.S. Attorney
1620 Dodge Street, #1400
Omaha, NE 68102-1506
Tel: (402) 661-3700
E-mail: lesley.woods@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all registered participants. I also hereby certify that a copy of the same was served by regular mail, postage prepaid, to the following non-CM/ECF participants: None.

s/ Lesley Woods
Assistant U.S. Attorney